

Message

From: Chris Nevers [Nevers.Chris@epa.gov]
Sent: 9/14/2012 4:04:30 PM
To: Steve Mazure [srm2@chrysler.com]
CC: Good, David [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6a0a212fab8644b89798966a2fff3ab8-Good, David]; Dalton, Joel [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5e590ca117f84cc384adcf13b68b4358-Dalton, Joel]; Morrie Lee [ml90@chrysler.com]
Subject: Re: Diesel IRAF for EDVs, not FE testing

Steve,

It is my understanding that IRAFs are not currently applied to any CAFE, FE label, or GHG calculations. I am not sure if a IRAF will be applied for 2017 and beyond for any of the mentioned programs, however. Furthermore, the LD CO2 deterioration of zero is a minimum value. One could still have a DF for LD CO2, the DF just can't be negative.

Regards,
Chris Nevers
EPA/OAR/OTAC
Compliance Division
734 214 4412

From: Steve Mazure <srm2@chrysler.com>
To: Chris Nevers/AA/USEPA/US@EPA
Cc: Joel Dalton/AA/USEPA/US@EPA, Morrie Lee <ml90@chrysler.com>, David Good/AA/USEPA/US@EPA
Date: 09/14/2012 11:33 AM
Subject: Diesel IRAF for EDVs, not FE testing

Chris,

Confirming our understanding that the IRAF (Infrequent Regeneration Additive Factor) is applied only during diesel EDV testing to show tailpipe compliance in addition to the emission DF. The IRAF is not then also applied during Fuel economy/consumption label testing or used for GHG CREE.

This was clearly spelled out in the HD GHG regulation. The LD GHG regulation clearly indicates the usage of CO2 Deterioration of zero.

Please confirm, thanks. I believe you verbally indicated that to Jeff Foor a while back.

Steven R. Mazure

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